

GRELLAS SHAH LLP  
20400 STEVENS CREEK BLVD, SUITE 280  
CUPERTINO, CA 95014

GRELLAS SHAH LLP  
GEORGE GRELLAS, ESQ. (SBN 83540)  
(gg@grellas.com)  
DHAIVAT H. SHAH, ESQ. (SBN 196382)  
(ds@grellas.com)  
DAVID I. SIEGEL, ESQ. (SBN 264247)  
(dsiegel@grellas.com)  
20400 Stevens Creek Blvd, Suite 280  
Cupertino, CA 95014  
Telephone: (408) 255 - 6310  
Facsimile: (408) 255 - 6350

Attorneys for Defendants, MC2 POOL & SPA,  
MICHAEL & BRIAN MCFALL PTRS,  
GUILLERMO B. MCFALL and BRIAN MCFALL

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

MARIO BARRERAS VALENZUELA,  
on behalf of all similarly situated others,

Plaintiff,

v.

MC2 POOL & SPA, MICHAEL &  
BRIAN MCFALL PTRS,  
GUILLERMO B. MCFALL and  
BRIAN MCFALL, et al.,

Defendant.

Case No.: C09-1698 RS

**JOINT STIPULATION TO CONTINUE  
DEADLINE TO FILE STIPULATION  
OF DISMISSAL AND HEARING ON  
ORDER TO SHOW CAUSE AND  
[PROPOSED] ORDER**

The parties have settled the matter as result of a settlement conference before Judge Beeler. Parties have since engaged in discussions for detailed provisions dealing with the novel issues of PAGA civil penalties. Plaintiff's counsel are currently traveling in Asia, and unable to finalize the settlement agreement. As such, parties request that the Court grant a 30-day continuance of the deadline set by this Court for the parties to file a stipulation of dismissal, to January 17, 2012, and reset the hearing on the order to show cause to January 24, 2013 at 1:30 p.m. ~~21, 2012.~~

Respectfully submitted,

GRELLAS SHAH LLP

LAW OFFICES OF ADAM WANG

By: /s/ David I. Siegel  
David I. Siegel, Esq.  
Attorneys for Defendants  
MC2 POOL & SPA, MICHAEL  
AND BRIAN MCFALL PTRS,  
GUILLERMO B. MCFALL AND  
BRIAN MCFALL


By: /s/ Adam Wang  
Adam Wang, Esq.  
Attorney for Plaintiff  
MARIO BARRERAS VALENZUELA

#### CERTIFICATION OF CONCURRENCE

I, David I. Siegel, attest that Adam Wang has concurred in the filing of this document.

/s/ David I. Siegel  
David I. Siegel

PURSUANT TO STIPULATION, IT IS SO ORDERED.

By:   
Hon. Richard Seeborg  
United States District Judge

Date: 12/18/12